

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
) No. 15 CR 149
)
) Judge John Z. Lee,
vs.)
) presiding
JONAS EDMONDS,)
)
 Defendant.)

**DEFENDANT JONAS EDMONDS' REQUEST FOR THIS COURT TO
RECOMMEND THAT HE SERVE HIS SENTENCE AT A
FACILITY CLOSE TO PHILADELPHIA, PENNSYLVANIA**

NOW COMES the Defendant JONAS EDMONDS by and through his attorney James A. Graham and respectfully requests that this Court issue a written recommendation to the Bureau of Prisons that Defendant JONAS EDMONDS serve his time at the United States Facility in close proximity to Philadelphia Pennsylvania, and in support states as follows;

1. That JONAS EDMONDS has pled guilty and stands convicted of providing material support to a foreign terrorist organization, and making a material false statement to a law enforcement officer under Title 18, U.S. C. sections 2339B(a)(1) and 1001(a)(2);

2. That the Defendant JONAS EDMONDS is currently in custody, and being held at the M.C.C. in Chicago and awaiting sentencing;

3. That under the Bureau of Prisons regulations, assignment to a

particular federal institution is governed primarily by the defendant's security classification;

4. Other factors that are considered by the Bureau of Prisons in determining a prisoner's prison designation are the type of sentence imposed, medical or psychiatric limitations, the existence of detainers, the severity of the offense, the types of prior commitments, the expected length of incarceration, history of escapes (or attempts), history of violence, closeness to home and family ties and the defendant's pre-commitment status;

5. That Defendant expects that his family can arranged to visit him regularly and fears that if an institution is selected farther from home that his family will be unable to visit him as regularly;

7. That a sentencing court's recommendation, though not binding, is one of the factors that the Bureau of Prisons will take into consideration in determining which institution, a prisoner should designated to;

WHEREFORE the Defendant JONAS EDMONDS respectfully requests that this Court draft a written recommendation to the Bureau of Prisons recommending that he be sent to the United States Facility near

Philadelphia.

Respectfully submitted,

James A. Graham

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James A. Graham (ARDC 6184279)

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CERTIFICATE OF SERVICE

I, James A. Graham, an attorney, certify that I shall cause to be served a copy of Defendant's "DEFENDANT JONAS EDMONDS' REQUEST FOR THIS COURT TO RECOMMEND THAT HE SERVE HIS SENTENCE AT A FACILITY CLOSE TO PHILADELPHIA, PENNSYLVANIA" upon the following individual(s) by personal delivery, this 13th day of January, 2016.

TO: Barry Jonas
John Kness
Asst. United States Attorney
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s/ James A. Graham

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